

U.S. DISTRICT COURT  
EASTERN DISTRICT OF WISCONSIN

## ATTACHMENT 1

2023 JUL 11 A 10:29

JULY 11, 2023

## COMPLAINT FORM

(for non-prisoner filers without lawyers)

IN THE UNITED STATES DISTRICT COURT  
FOR THE Eastern DISTRICT OF Wisconsin

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(Full name of plaintiff(s))

Kevin Paul Sandgren

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vs

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(Full name of defendant(s))

Dennis McDonough,

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Secretary,

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Department of the Veterans Affairs

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Case Number:

**23-C-0927**

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(to be supplied by clerk of court)

### A. PARTIES

1. Plaintiff is a citizen of USA and resides at  
(State)

4007 s 76 street apt. 6 Milwaukee, WI. 53220

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(Address)

(If more than one plaintiff is filing, use another piece of paper).

2. Defendant Department of Veterans Affairs  
(Name)

is (if a person or private corporation) a citizen of \_\_\_\_\_  
(State, if known)

and (if a person) resides at \_\_\_\_\_  
(Address, if known)

and (if the defendant harmed you while doing the defendant's job)

worked for \_\_\_\_\_  
(Employer's name and address, if known)

(If you need to list more defendants, use another piece of paper.)

## B. STATEMENT OF CLAIM

On the space provided on the following pages, tell:

1. Who violated your rights;
2. What each defendant did;
3. When they did it;
4. Where it happened; and
5. Why they did it, if you know.

See my attachment of my statement

The plaintiff, Kevin Sandgren tried to get a job with V.A. In Milwaukee. WI. With was about my 20 time and on 12/21/21 I received a email that the job I applied for got sent to the hiring manager which means I'm now getting a interview on 2/09/22 I received a email that I didn't get the job but didn't received a interview I email H.R. on the 2/10/22 and she responded to me on 2/12/22 with attitude that they don't need to interview me because there's a temporary policy call "direct hire" because of Covid I then connected the EEO to see if they can investigate my case which they did.

The V.A. claimed there reason they didn't is because of the "direct hiring" and that is what the V.A. Lawyer main defense is the problem is in my case it's a supervisor that is in charge of the interview panel so he's the one to say he used "direct hiring" but if you go through his sworn affidavit and his rebuttal he never mentions it and what he does say is this in short version "he never received my application file because the screener found me not qualified and never referred me to the hiring manager" but I was referred but someone at the V.A. Switch my application with someone else because they wanted to make sure I couldn't get the job because of their discrimination of me because of my disability, age, and military status and when I contact H.R. about this her own discrimination against me because of my disability, age, and military service she refused to do her job to find out what happened not only did she give me attitude but she gave attitude to the EEO investigator because she was refusing to answer her rebuttal questions and they told her if she doesn't they are going to have to tell her boss that because of her discrimination against me of disabilities, age, and military service.

I have always felt that the V.A. Discriminated against disability and I talk about this to the H.R. in 8/13/19 and she had me talk to the EEO that works at the V.A. Which I did but I only had a feeling about it but know I have the proof on disability and age they are about the same I have a severe learning disability but I want to a trade school to learn HVACR graduate top of my class and have been working in the maintenance field over 30 years even have a commercial contract license in HVACR field and at the time I was going to turn 60 the person that got the job is about early 30 he got a fancy college degree that has nothing to do with maintenance or

construction he then work over 11 years in his chosen field still not maintenance and construction he then work at Aurora hospital that's is first time in the maintenance field and still not in construction he work there less then one year before he got the job at the V.A. That we applied for I was told by the V.A. Lawyer that the gentleman that got the was more qualified because he has that fancy college degree and his experience working in the hospital even though it was less then one year so not only he's the less qualified he is not even qualified because one requirement is that you have to have a EPA universal license because part of your job was to work with HVACR to work with Freon it's like driving a big rig without a CDL which he doesn't have also there was two other candidates that where referred about my same age and work history also didn't get the job.

My complaint about military service is a little like disability if your disabled you fill out a SCHEDULE "A" form so you can get your points and to let the hiring manager and the person doing the interview panel knows about your disability I filled mine out in 2018 and hand deliver to H.R. and in her affidavit she said she knew I have a disability but on the form I found in the EEO investigation report doesn't list it or give me my points so the hiring manager and the supervisor didn't know I had a disability so what happened to my SCHEDULE "A" form the V.A. Lawyer was under the impression that I'm supposed to notify them ever time I applied but there is no way for me to inform them because they responded by non-response emails also on that form list me as "N V" the V.A. lawyer confirmed that "N V" stands for " non-veteran" so even though I served honorable in the military the V.A. Says I did not serve in the military and the V.A. Lawyer says it was a mistake to list me as that but they would never to not see three documents and one of them is a full page DD-214 which is my military history they did this so they don't have to give me my points to give me a edge against the there candidate that would not have points going into the interview.

### C. JURISDICTION

I am suing for a violation of federal law under 28 U.S.C. § 1331.

OR

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I am suing under state law. The state citizenship of the plaintiff(s) is (are) different from the state citizenship of every defendant, and the amount of money at stake in this case (not counting interest and costs) is \$ \_\_\_\_\_.

D. RELIEF WANTED

Describe what you want the court to do if you win your lawsuit. Examples may include an award of money or an order telling defendants to do something or stop doing something.

See my attachment

What I would like happened is they no longer do the way they interview and hire practices and the V.A. Lawyer told my that I can ask for one year salary in my case it's \$70,000 for damages I have try 20 times to get a job at the V.A. But because there history of discrimination I fill I should be able to ask for that times 20 time 3 because of the 3 discrimination and I'm told I also can get punitive damages because of there action deserve to be punished so they can't do it no more the V.A. Lawyer told me that punitive damage is \$300,000 times 20 times 3 that I laid out earlier that comes out to damage \$4.2 million and punitive damage \$18 million plus court cost.

E. JURY DEMAND

Jury Demand - I want a jury to hear my case  
OR  
 Court Trial – I want a judge to hear my case

Dated this 09 day of July 2023.

  
Respectfully Submitted,  
\_\_\_\_\_  
Signature of Plaintiff

843-338-1110

Plaintiff's Telephone Number

Sandgrens@hotmail.com

Plaintiff's Email Address

4007 s 76 street apt. 6

Milwaukee, WI. 53220

(Mailing Address of Plaintiff)

(If more than one plaintiff, use another piece of paper).

**REQUEST TO PROCEED IN DISTRICT COURT WITHOUT PREPAYING THE  
FILING FEE**

I DO request that I be allowed to file this complaint without paying the filing fee. I have completed a request to proceed in the district court without prepaying the fee and attached it to the complaint.

I DO NOT request that I be allowed to file this complaint without prepaying the filing fee under 28 U.S.C. § 1915, and I have included the full filing fee with this complaint.

**Erin E. Kaiser**  
**Staff Attorney**  
**Office of Chief Counsel – Midwest District**  
**U.S. Department of Veterans Affairs**  
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